MRM:BTK F. #2023R00886/OCEDTF# NY-NYE-0925

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FILED IN CLERK'S OFFICE U.S. DISTRICT COURT E.D.N.Y.

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

UNITED STATES OF AMERICA

Cr. No.

503

- against -

JUSTIN STRIDIRON, also known as "AJ Schemes" and "Sunny." (T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(d)(1), 2 and 3551 et seq.; T. 21, U.S.C., §§ 841(b)(1)(A)(vi), 841(b)(1)(C), 841(b)(2), 846, 853(a) and 853(p); T. 28, U.S.C., § 2461(c))

Defendant.

AZRACK, J.

WICKS, M.J.

THE GRAND JURY CHARGES:

## COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

1. In or about and between September 2021 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUSTIN STRIDIRON, also known as "AJ Schemes" and "Sunny," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved: (a) a substance containing heroin, a Schedule I controlled substance; (b) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance; (c) a substance containing cocaine, a Schedule II controlled substance; and (d) a substance containing Tramadol, a Schedule IV controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of fentanyl involved in the conspiracy attributable the

defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 400 grams or more of a substance containing fentanyl.

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(vi), 841(b)(1)(C) and 841(b)(2); Title 18, United States Code, Sections 3551 et seq.)

## <u>COUNT TWO</u> (Unlawful Use of Firearms)

2. In or about and between September 2021 and the date of this Indictment, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUSTIN STRIDIRON, also known as "AJ Schemes" and "Sunny," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a drug trafficking crime, to wit: the crime charged in Count One, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crime.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 2 and 3551 et seq.)

## CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

- 4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value;
  - (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

## CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO

- 5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924, or involved in or used in any violation of any other criminal law of the United States.
- 6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON

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By Carolyn Pokorny, Assistant U.S. Attornsy BREON PEACE UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK FORM DBD-34 JUN. 85

F.#: 2023R00886/OCEDTF# NY-NYE-0925 UNITED STATES DISTRICT COURT EASTERN District of NEW YORK CRIMINAL DIVISION THE UNITED STATES OF AMERICA VS. JUSTIN STRIDIRON, also known as ""AJ Schemes" and "Sunny," Defendant. INDICTMENT (T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(d)(1), 2 and 3551 et seq.; T. 21, U.S.C., §§ 841(b)(1)(A)(vi), 841(b)(1)(C), 841(b)(2) 846, 853(a) and 853(p); T. 28, U.S.C., § 2461(c)) A true bill. Foreperson Filed in open court this \_\_\_\_\_\_day. of \_\_\_\_\_ A.D. 20 \_\_\_\_ Clerk Bail, \$ \_\_\_\_\_

Bradley T. King, Assistant U.S. Attorney (631) 715-7900